

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

ANGEL DAVID MORALES VALLELLANES,
Plaintiff,

v.

**JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET ALS.,**
Defendants.

CIVIL NO. 97-2459 (GAG)(CVR)

**DAMAGES BASED ON RETALIATION
AND DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES; UNFAIR
LABOR PRACTICES; BREACH OF
COLLECTIVE BARGAINING
AGREEMENT**

**TRIAL BY JURY IS HEREBY
REQUESTED**

PLAINTIFFS' MOTION FOR PROPOSED VOIR DIRE

TO THE HONORABLE COURT:

COMES NOW, Plaintiff, Angel David Morales-Vallellanes, through the undersigned attorneys, respectfully submit the following proposed Voir Dire as follows:

PLAINTIFF'S PROPOSED VOIR DIRE

1. Do you know defendant's attorney Fidel Sevillano? If so, please explain your relationship with them? For how long have you known him or them? Are you related to him or them?
2. Do you know or are related to the United States Postmaster General? Explain how are you related to him or her?
3. Are you or any close relative a current or former federal employee? If so, explain.
4. Are you or any close relative a member or former member of the armed forces or a veteran? If so, explain.
5. Do you belong to a fraternity or other social or community organizations?

6. Are you know what masonry is? Are you a mason?
7. Are you or have you been a member of a labor union? If so, explain.
8. Have you ever been related to labor union?
9. Have you ever been opposed to a strike? If so, explain.
10. Have you ever been affected in any way by a strike?
11. Do you currently hold or in the past held a management position at work? If so, explain.
12. What is your opinion about labor unions?
13. What is your opinion about legislation directed to protect workers' rights?
14. Have you ever suffered of a permanent or temporary disability? If so, explain.
15. Have you ever filed a claim, charge or suit against an employer for discrimination or retaliation in your employment? If so, explain.
16. Have you ever been a victim of discrimination or retaliation? If so, explain.
17. Do you feel that a person has the right to report violations of law committed by his employer? Do you believe that people should be protected for doing so?
18. Do you suffer of any physical or mental condition that may not allow you to provide your full attention during the trial?
19. Do you understand English?
20. What is your academic education?
21. Have you ever been a juror in the past?
22. Is there any reason why you may not be able to render an unbiased decision in this case?
23. Is there any reason for you to refuse to be a juror in this case?

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of above information.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on December 5, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

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